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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

Zacariah Purdie,

Case No. 11-6169-TC

Plaintiff,

COMPLAINT FOR VIOLATIONS OF
FAIR DEBT COLLECTION PRACTICES
ACT

v.

Quick Collect, Inc.,

JURY REQUESTED

Defendant.

JURISDICTION

1. Jurisdiction of this Court arises under 28 U.S.C. § 1331 and pursuant to 15 U.S.C. § 1692k(d).
2. This action arises out of Defendant's violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. ("FDCPA").

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3. Venue is proper in this district because the acts and transactions occurred here, Plaintiff resides here.

PARTIES

4. Plaintiff, Zacariah Purdie, (hereinafter "Plaintiff"), is a natural person who resides in the City of Keizer, State of Oregon, and are a "consumer" as that term is defined by 15 U.S.C. § 1692a(3).

5. Defendant, Quick Collect, Inc., (hereinafter "Defendant"), is licensed to conduct business in the State of Oregon and is a "debt collector" as that term is defined by 15 U.S.C. § 1692a(6).

FACTUAL ALLEGATIONS

6. On or about April 8, 2011, Defendant filed a small claims complaint in Marion County Circuit Court, case number 11C13740, against the Plaintiff.

7. In the Marion County Case the defendant is attempting to collect for medical bills incurred by plaintiff's wife's son.

8. Plaintiff is not responsible to pay Defendant for the bills incurred by his wife's son.

TRIAL BY JURY

9. Plaintiff is entitled to and hereby respectfully demands a trial by jury. U.S. Const. Amend. 7. Fed. R. Civ. Pro. 38.

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CAUSES OF ACTION

COUNT I.

VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT

15 U.S.C. § 1692 *et seq.*

10. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

11. The foregoing acts and omissions of Defendant constitute numerous and multiple violations of the FDCPA including, but not limited to, 15 U.S.C. § 1692d, 1692e and 1692f.

12. As a result of Defendant's violations of the FDCPA, Plaintiff is entitled to actual damages pursuant to 15 U.S.C. § 1692k(a)(1); statutory damages in an amount up to \$1,000.00 pursuant to 15 U.S.C. § 1692k(a)(2)(A); and, reasonable attorney's fees and costs pursuant to 15 U.S.C. § 1692k(a)(3).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that judgment be entered against Defendant for:

COUNT I.

VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT

15 U.S.C. § 1692 *et seq.*

For an award of actual damages, pursuant to 15 U.S.C. § 1692k(a)(1) against Defendant;

For an award of statutory damages of \$1,000.00, pursuant to 15 U.S.C. § 1692k(a)(2)(A) against Defendant;

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For an award of costs of litigation and reasonable attorney's fees, pursuant to 15 U.S.C. § 1692k(a)(3) against Defendant.

DATED this 17th Day of May, 2011.



Keith D. Karnes, OSB #03352
Attorney for the Plaintiff

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